

GENWAL COAL COMPANY

January 14, 1992

Mr. Daron Haddock
Division of Oil, Gas & Mining
3 Triad Center, Suite 350
355 West, North Temple
Salt Lake City, Utah 84180-1203

RECEIVED**JAN 17 1992****DIVISION OF
OIL GAS & MINING**

RE: Permit # ACT 015-032
Genwal Coal Company
Submittal Revisions
Mine Plan / Chapter 14

Dear Mr. Haddock:

As per our telephone conversations please find enclosed fourteen (14) copies of revised pages 14-2, 14-5, 14-6, 14-38, and 14-40 of chapter 14. These revised pages reflect a 21 degree angle of draw under the perennial stream channels. I hope that this is agreeable with DOGM and USFS as well as State Lands.

Genwal Coal Company continues to believe that the 21 degree angle of draw is two conservative but agrees to it until further studies can be conducted which might support a smaller angle of draw. Please replace the old (revised 12/20/91) pages 14-5, 14-6, 14-38, and 14-40, as well as plate 3-3 with the newly revised (revised 1/14/92) pages.

John Blake's comments and concerns expressed in his December 31, letter are addressed below.

Barrier Pillars:

The proposed subsidence area to be permitted upon national forest lands does make it possible to mine up to the property boundary, but only if other laws, regulations, practical engineering design, and good mining practice are not considered. Barrier Pillars used in the mine plan submitted in chapter 14 for State Leases ML-21568 and ML-21569 were designed using accepted engineering methods. Three widely used formulas, the Mine Foreman (Ashley), British,

and Holland formulas, were used to determine a minimum barrier size of between 225' and 300'. Federal Regulations mandate in CFR 43 Part 3484.1 (c6) that a minimum boundary barrier of 50' be left in place, in addition MSHA requires a minimum of 50' barrier between adjacent properties. Seam location and geometry, pillar size and shape, panel layout, ventilation, operating experience, and engineering judgment all have an effect on barrier dimensions.

As the plan shows no second mining of barrier pillars is planned at this time. Barrier pillars are designed to protect mine workings by supporting stresses that are redistributed from the mining of section panels. Because these barriers are "loaded up" with high concentrations of stresses it is not good mining practice to second mine barrier pillars and in fact could be dangerous.

Retreat Mining of Mains and Submains:

The mains and submains are needed to provide access and ventilation for the mining of present leases and adjacent lands. The plan states Mains and Submains will not be retreat mined. Mains and submains in mines that have been operating for an extended period of time are generally not retreated due to several reasons. With production panels on both sides being fully retreated the mains and submains tend to load-up and deteriorate with time. Trying to pull pillars that are loaded-up can be risky and could possibly result in bumps that can result in injuries to workers. Pulling the mains with sealed panels on both sides could result in rupturing the seals allowing Carbon Monoxide, Methane or other noxious gas to escape from the sealed area into the Mains being pulled.

The Mysterious Submain 5th West:

The mysterious submain 5th West is not really a mystery, it can readily be identified as the bleeder that runs east-west at the top of section 36. The submain 5th West (bleeder), is needed to complete the wrap around bleeder system required by MSHA for ventilation purposes.

Underground Drill Holes:

The State Lands concern about the stated 100' drill holes are not adequate to penetrate both the Blind Canyon and the Bear Canyon seams. It was Genwal's belief that the seam in question was the Blind Canyon, in which a 100' hole

would be adequate. Since State Lands is concerned with the Bear Canyon in addition to the Blind Canyon seam. Genwal Coal Company will commit to drilling the up holes a maximum of 150' even though there is no indication of minable height of either upper seam on our present leases. Please see revised page 14-2.

Genwal Coal Company has already committed to evaluating the upper seams for minability prior to second mining (page 14-2).

In addition please find enclosed the Affidavit of Publication. If I am not mistaken this will officially start the 30 day public comment period.

If you have any questions or comments please call.

Sincerely;

R. Jay Marshall

R. Jay Marshall P.E.
Chief Engineer
Genwal Coal Company